

# MAZZOLA LINDSTROM LLP

SHAN CHEN, ESQ.  
RUOFEI XIANG, ESQ.  
[JESSICA@MAZZOLALINDSTROM.COM](mailto:JESSICA@MAZZOLALINDSTROM.COM)  
[RUOFEI@MAZZOLALINDSTROM.COM](mailto:RUOFEI@MAZZOLALINDSTROM.COM)  
(646) 216-8300

May 5, 2023

**VIA ECF**

Honorable Brian R. Martinotti and Honorable Edward S. Kiel  
United States District Court District of New Jersey  
50 Walnut Street, Newark, New Jersey 07102

**RE: *Xiamen ITG Group Corp. Ltd. v. Crystal Vogue Inc.***  
**Docket No.: 2:21-cv-02813-BRM-ESK**  
**Request of Continuous Administrative Hold**

Dear Your Honor,

Pursuant to the Court's May 1, 2023 Order, we respectfully request that the Court continue to place this matter on administrative hold.

As Your Honor is aware, we commenced this action seeking confirmation and summary enforcement of the arbitral award rendered by the China International Economic and Trade Arbitration Commission ("CIETAC") on March 10, 2020 in favor of our client Xiamen ITG [Xiamen ITG Group Corp. Ltd.]. During the prosecution of this matter, we were advised by Respondent's counsel that his client was insolvent, which led to this matter being administratively terminated.

We have reached out to our client to confirm their intention to reopen this matter and resume prosecution. However, due to a national holiday in China, most businesses have been closed since the end of April and we have not been able to discuss this matter yet with our client. However, it is likely that our client may still want to reinstate this case to pursue a confirmation of the arbitration award. We therefore respectfully request the Court to put this file on hold for another 30 days, or such time that the Court deems appropriate, for our client to make a determination.

Thank you very much.

Respectfully submitted,

**MAZZOLA LINDSTROM LLP**



---

Shan Chen, Esq.

Ruofei Xiang, Esq.

1350 Avenue of the Americas, Second Floor  
New York, NY 10019

Tel.: (646) 216-8300

[jessica@mazzolalindstrom.com](mailto:jessica@mazzolalindstrom.com)

[ruofei@mazzolalindstrom.com](mailto:ruofei@mazzolalindstrom.com)

*Attorneys for Petitioner*

CC: *All Counsel of Record via ECF*